

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**  
*Criminal No.: 21-cr-108 (PAM/TNL) (3)*

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UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
vs. )  
 )  
J ALEXANDER KUENG, )  
 )  
Defendant. )  
 )  
 )

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**DEFENDANT’S PRETRIAL  
MOTION FOR SEVERANCE OF  
DEREK CHAUVIN (DEFENDANT 1)**

The Defendant moves this Court for an order granting him a severance from Derek Chauvin (Defendant 1) on the grounds that:

1. The investigation of the co-defendant(s) involves specific facts and certain evidence to be offered at trial against the co-defendant(s); the admission of such evidence at a joint trial would cause confusion and prejudice and deprive Defendant of his right to a fair trial.

2. There is a conflict of interest between the defendants. The conflict flows from Mr. Chauvin’s level of culpability. Due to this conflict, the jurors will not be able to follow the Court’s instructions and compartmentalize the evidence as it related to Mr. Kueng.

This Motion is based upon all the files, records, and proceedings herein.

Respectfully submitted,

Dated: August 2, 2021

/s/ Thomas C. Plunkett

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